

PRELIMINARY DRAFT

CERTIFIED MAIL _____ **-RETURN RECEIPT REQUEST**

File No.: LA0000914

AI No.: 1395 Activity No.: PER20080001

Mr. Hebert Lance Jr., Director, EHS
Lion Copolymer, LLC
Baton Rouge Plant
5955 Scenic Highway
Baton Rouge, LA 70805-2044

RE: Draft Modified Louisiana Pollutant Discharge Elimination System (LPDES) permit to discharge treated process wastewater and process area stormwater, sanitary wastewater, non-process area stormwater runoff, utility wastewater including cooling water and well water, resin bed regeneration water, and commingled first flush wastewaters (the first 0.1 to 0.6 inches of effluent from the collection basins) from Outfalls 010, 014, and 020 (Outfall 001), the combined discharge of stormwater, well water, and condensate (Outfalls 010 and 014), the combined discharge of stormwater, well water, power plant blowdown and condensate (Outfall 020), and well water and stormwater runoff from the fire water reserve area (Outfall 015) to Monte Sano Bayou thence to the Mississippi River from an existing synthetic rubber manufacturing facility located at 1836 Shada Avenue in Baton Rouge, East Baton Rouge Parish.

Dear Mr. Lance:

The Department of Environmental Quality proposes to modify an existing LPDES permit with the effluent limitations, monitoring requirements, and special conditions listed in the attached DRAFT MODIFIED PERMIT. Upon the effective date of the FINAL MODIFIED PERMIT, the FINAL MODIFIED PERMIT shall replace the previously effective State (LPDES) permit.

The draft modification(s) of the current LPDES permit include:

1. Outfalls 010 and 014 - Lion Copolymer has indicated that power plant blowdown (boiler blowdown) is not discharged through these outfalls. Therefore, the outfall descriptions have been updated to remove power plant blowdown as a contributing source. Changes were made to the permit under Part I, Pages 4 and 5.
2. Outfalls 010 and 014 - TSS limitations were originally established due to power plant blowdown discharges. Therefore, TSS has been removed as a parameter from these outfalls. Changes were made to the permit under Part I, Pages 4 and 5.

In accordance with LAC 33:IX.3105.B.2, only those permit limitations and conditions pertaining to the draft modification(s) are open for public comment.

PRELIMINARY DRAFT

Lion Copolymer, LLC
 RE: LA0000914, AI No. 1395
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This Office will publish a public notice one time in a local newspaper of general circulation and the Office of Environmental Services Public Notice Mailing List. A copy of the public notice containing the specific requirements for commenting to this draft permit action will be sent under separate cover at the time the public notice is arranged. In accordance with LAC 33:IX.6521.A, the applicant shall receive and is responsible for paying the invoice from the above mentioned newspaper. LAC 33:IX.6521.A states: "...the costs of publication shall be borne by the applicant."

The invoice, fee rating worksheet, and a copy of the fee regulations will be sent under a separate cover letter as applicable. Please note that a copy of the fee rating worksheet is also attached to this draft permit. A copy of the entire Louisiana Water Quality Regulations may be obtained from the DEQ Office of Environmental Assessment, Post Office Box 4314, Baton Rouge, Louisiana 70821-4314, (225) 219-3236.

Pursuant to LAC 33:IX.1309.I, LAC 33:IX.6509.A.1 and LAC 33:I.1701, you must pay any outstanding fees to the Department. Therefore, you are encouraged to verify the facility's fee status by contacting LDEQ's Office of Management and Finance, Financial Services Division (225) 219-3863. Failure to pay in the manner and time prescribed could result in applicable enforcement actions as prescribed in the Environmental Quality Act, including, but not limited to revocation or suspension of the applicable permit, and/or assessment of a civil penalty against you.

Should you have any questions concerning any part of the **DRAFT MODIFIED PERMIT**, public notice requirements, or fee, please feel free to contact Jennifer Sheppard, Office of Environmental Services, at the address on the preceding page, telephone (225) 219-3138. To ensure that all correspondence regarding this facility is properly filed, please reference your Agency Interest (AI) number 1395 and LPDES permit number LA0000914 on all future correspondence to this Department, including Discharge Monitoring Reports.

Sincerely,

Jesse Chang
 Environmental Scientist Manager
 Industrial Water Permits

jls

Attachment(s) modified draft permit, factsheet, and fee sheet:

cc: Jenniffer Sheppard
 Water Permits Division

IO-W

ec: Ms. Gayle Denino
 Office of Management & Finance
 Permit Compliance Unit
 Office of Environmental Compliance

ec: For Public Notice
 Public Participation Group
 Office of Environmental Assistance

Scott Guilliams
 Water Permits Division

DRAFT



PERMIT NUMBER

LA0000914

AI No.: 1395

OFFICE OF ENVIRONMENTAL SERVICES
Water Discharge Permit

Pursuant to the Clean Water Act, as amended (33 U.S.C. 1251 et seq.), and the Louisiana Environmental Quality Act, as amended (La. R. S. 30:2001 et seq.), rules and regulations effective or promulgated under the authority of said Acts, and in reliance on statements and representations heretofore made in the application, a Louisiana Pollutant Discharge Elimination System permit modification is issued authorizing

Lion Copolymer, LLC
 Baton Rouge Plant
 5955 Scenic Highway
 Baton Rouge, LA 70805-2044

Type Facility:

synthetic rubber manufacturing facility

Location:

1836 Shada Avenue in Baton Rouge
 East Baton Rouge Parish

Receiving Waters:

Monte Sano Bayou, thence to the Mississippi River (Outfalls 001, 010, 014, 015, and 020) - Subsegment 070504

to discharge in accordance with effluent limitations, monitoring requirements, and other conditions set forth in Parts I, II, III attached hereto.

This permit and the authorization to discharge were effective on September 1, 2007 and shall expire five (5) years from the original effective date of the permit.

This permit was not previously modified.

This modification shall become effective on _____

Issued on _____

Cheryl Sonnier Nolan
 Assistant Secretary

PART I

Draft Modified Page 4 of 7
 Permit No. LA0000914
 AI No. 1395

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

During the period beginning the effective date and lasting through the expiration date the permittee is authorized to discharge from:

Outfall 010, the combined discharge of stormwater, well water, and condensate.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>		<u>Discharge Limitations</u>				<u>Monitoring Requirements</u>	
CONVENTIONAL AND NON-CONVENTIONAL	STORET Code	(lbs/day, UNLESS STATED)		(mg/L, UNLESS STATED)		Measurement Frequency(*1)	Sample Type
		Monthly Average	Daily Maximum	Monthly Average	Daily Maximum		
Flow-MGD	50050	Report	Report	---	---	1/week	Estimate
TOC	00680	---	---	---	50	1/month	Grab
Total Residual Chlorine(*2)	50060	---	---	---	Report	1/quarter	Grab
Oil and Grease	03582	---	---	---	15	1/week	Grab
pH Minimum/Maximum Values (Standard Units)	00400	---	---	6.0 (*3) (Min)	9.0 (*3) (Max)	1/week	Grab

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Outfall 010, at the point of discharge from Collection Basin No. 10, prior to combining with other waters.

Note: commingled first flush wastewater (the first 0.1 to 0.6 inches of effluent from the collection basin) is routed to the biological treatment system and discharged through Outfall 001.

FOOTNOTE(S):

(*1) When discharging.

(*2) See Part II.J.

(*3) The permittee shall report on the Discharge Monitoring Reports both the minimum and maximum instantaneous pH values measured.

PART I

Draft Modified Page 5 of 7
 Permit No. LA0000914
 AI No. 1395

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

During the period beginning the effective date and lasting through the expiration date the permittee is authorized to discharge from:

Outfall 014, the combined discharge of stormwater, well water, and condensate.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>STORET Code</u>	<u>Discharge Limitations</u>		<u>Other Units</u>		<u>Monitoring Requirements</u>	
		(lbs/day, UNLESS STATED)	(mg/L, UNLESS STATED)	Monthly	Daily	Measurement Frequency(*1)	Sample Type
CONVENTIONAL AND NON-CONVENTIONAL		Monthly Average	Daily Maximum	Monthly Average	Daily Maximum		
Flow-MGD	50050	Report	Report	---	---	1/week	Estimate
TOC	00680	---	---	---	50	1/week	Grab
Total Residual Chlorine(*2)	50060	---	---	---	Report	1/quarter	Grab
Oil and Grease	03582	---	---	---	15	1/month	Grab
pH Minimum/Maximum Values (Standard Units)	00400	---	---	6.0 (*3) (Min)	9.0 (*3) (Max)	1/week	Grab

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Outfall 014, at the point of discharge from Collection Basin No. 14, prior to combining with other waters.

Note: commingled first flush wastewater (the first 0.1 to 0.6 inches of effluent from the collection basin) is routed to the biological treatment system and discharged through Outfall 001.

FOOTNOTE(S):

(*1) When discharging.

(*2) See Part II.J.

(*3) The permittee shall report on the Discharge Monitoring Reports both the minimum and maximum instantaneous pH values measured.

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January 23, 2007

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LOUISIANA WATER POLLUTION CONTROL FEE SYSTEM
REVISED RATING WORKSHEETPERMIT NO. LA0000914 AI NO. 1395 Activity No.: PER20060004

- 1.a. Company Name Lion Copolymer, LLC
- 1.b. Facility Name Baton Rouge Plant
2. Local Mailing Address 5955 Scenic Highway
Baton Rouge, LA 70805-2044
3. Billing Address (If different) _____
- 4.a. Facility Location 1836 Shada Avenue in Baton Rouge
- 4.b. Parish East Baton Rouge
5. Facility Type synthetic rubber manufacturing facility
6. Products Produced emulsion styrene/butadiene rubber (SBR) and emulsion acrylonitrile/butadiene rubber (NBR)
- 6.a. Raw materials stored or used _____
- 6.b. By-products produced _____
7. Primary SIC Code 2822 7.a. Other SIC Codes _____
8. Fac. Manager _____ 8.a. Telephone _____
9. Owner _____ 9.a. Telephone _____
10. Env. Contact Herb Lance, Jr. 10.a. Telephone 225-267-3400

11. State Permit No. LA000091411.a. Date Issued July 17, 200711.b. New ☒ Modified ☐

12. NPDES Permit No. _____

12.a. Effective Date _____

12.b. Expiration Date _____

13. Number and Identification of Outfalls

*Outfall 001 - treated process wastewater and process area stormwater, sanitary wastewater, non-process area stormwater runoff, utility wastewater including cooling water and well water, resin bed regeneration water, and commingled first flush wastewaters (the first 0.1 to 0.6 inches of effluent from the collection basins) from Outfalls 010, 014, and 020.

*Outfalls 010 and 014 - the combined discharge of stormwater, well water, and condensate.

*Outfall 020 - the combined discharge of stormwater, well water, power plant blowdown and condensate.

*Outfall 015 - and well water and stormwater runoff from the fire water reserve area.

14. Number of Injection Wells N/A

15. Water Source(s) _____

16. Receiving Water(s) Monte Sano Bayou17. River Basin Mississippi River18. Basin Segment No. 070504

TOTAL RATING POINTS ASSIGNED

185.914

Federal Tax I. D. No.: _____

fls Initials of Rater

Invoice No. _____

ANNUAL FEE RATING WORKSHEET - INDUSTRIAL
PERMIT NO. LA0000914, AI No. 1395, PER20060004

Page 2

1. FACILITY COMPLEXITY DESIGNATION

Primary SIC 2822

Complexity Designation = _____

Other SIC _____

- | | | |
|----------|-----|-------------|
| _____ | I | (0 points) |
| _____ | II | (10 points) |
| _____ | III | (20 points) |
| _____ | IV | (30 points) |
| <u>✓</u> | V | (40 points) |
| _____ | VI | (50 points) |

COMPLEXITY DESIGNATION POINTS 40

2. FLOW VOLUME AND TYPE

A. Wastewater Type I

Is total Daily Average Discharge greater than 400 mgd?

_____ Yes, then points = 200

_____ No, then

Points = 0.5 X Total Daily Average Discharge (mgd)

Points = 0.5 X _____ = _____
 Total points = _____

B. Wastewater Type II

Points = 10 X Total Daily Average Discharge (mgd)

Points = 10 X 2.7 = 27
 Total points = 27

C. Wastewater Type III

Points = 2 X Total Daily Average Discharge (mgd)

Points = 2 X _____ = _____
 Total points = 0

FLOW VOLUME AND TYPE POINTS 27

3. POLLUTANTS

A. BOD or _____

Daily Average Load = _____

- | | | |
|----------|---------------|-------------|
| _____ | < 50 lb/day | (0 points) |
| _____ | > 50 - 500 | (5 points) |
| _____ | > 500 - 1000 | (10 points) |
| <u>✓</u> | > 1000 - 3000 | (20 points) |
| _____ | > 3000 - 5000 | (30 points) |
| _____ | > 5000 lb/day | (calculate) |

Points = 0.008 X Daily Average Load (lbs)

Points = 0.008 X 0 = 0

COD or _____

Daily Average Load = _____

- | | | |
|----------|----------------|-------------|
| _____ | ≤ 100 lb/day | (0 points) |
| _____ | > 100 - 500 | (5 points) |
| _____ | > 500 - 1000 | (10 points) |
| _____ | > 1000 - 5000 | (20 points) |
| _____ | > 5000 - 10000 | (30 points) |
| <u>✓</u> | > 10000 lb/day | (calculate) |

Points = 0.004 X Daily Average Load (lbs)

Points = 0.004 X 17640 = 70.56

BOD OR COD DEMAND POINTS 70.56
 (whichever is greater)

PRELIMINARY DRAFT - MAJOR MODIFICATION

Invoice No. _____

ANNUAL FEE RATING WORKSHEET - INDUSTRIAL
PERMIT NO. LA0000914, AI No. 1395, PER20060004

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B. TSS

Daily Average Load = _____

_____	≤ 100 lb/day	(0 points)
_____	> 100 - 500	(5 points)
_____	> 500 - 1000	(10 points)
<u>✓</u> _____	> 1000 - 5000	(20 points)
_____	> 5000 - 10000	(30 points)
_____	> 10000 lb/day	(calculate)

Points = 0.004 X Daily Average Load (lbs)

Points = 0.004 X 0 = 0TSS POINTS 20C. TOXICSTotal Annual Discharge to Water = 335.35 (lbs)

Points = 0.01 X Annual discharge (lbs)

Points = 0.01 X 335.35 = 3.3535TOXIC POINTS 3.3535TOTAL POLLUTANT POINTS 93.9135

4. TEMPERATURE (HEAT LOAD)

Heat Load = Average Summer flow (mgd) X T X 0.00834where T = Permit Limit (Max. Temp.) - 70°Heat Load = 0 (mgd) X 0 X 0.00834 = 0 Billion BTU

Heat Load = <u>0</u>	≤ 4 billion BTU	(0 points)
_____	> 4-20 billion BTU	(5 points)
_____	> 20-100 billion BTU	(10 points)
_____	> 100-200 billion BTU	(15 points)
_____	> 200 billion BTU	(20 points)

HEAT LOAD POINTS 0

5. POTENTIAL PUBLIC HEALTH IMPACTS

Is the receiving water to which the wastewater is discharged or a water body to which it is a tributary used as a drinking water supply source within 50 miles downstream?

✓ No (0 points)
_____ Yes, then . . .

Complexity Designation

_____	I, II (0 points)
_____	III (5 points)
_____	IV (10 points)
_____	V (20 points)
_____	VI (30 points)

POTENTIAL PUBLIC HEALTH IMPACT POINTS 0

6. MAJOR/MINOR FACILITY DESIGNATION

Has your facility been designated a Major Facility by the administrative authority?

✓ Yes, then Points = 25
_____ No, then

were effluent limitations assigned to the discharge based on water quality factors in the receiving stream?

✓ No, then Points = 0
_____ Yes, then Points = 5TOTAL MAJOR/MINOR POINTS 25TOTAL RATING POINTS ASSIGNED 185.914

PRELIMINARY DRAFT - MAJOR MODIFICATION